

Draft proposed responses to MCE 10/17/2013 letter to Karl

[See file “2013\_10\_17\_EPA\_WestLakeQuestions.pdf” for full text of MCE’s questions]

1) Did EPA Region 7 consider a landfill fire...

A: No. No “landfill fires” or subsurface oxidation events were identified during the remedial investigation, feasibility study, or proposed plan phases of work on OU-1.

2) What, if any, measures did the EPA undertake...

A: Both the North Quarry and South Quarry landfills operated under permits from the Missouri Department of Natural Resources. As the sole regulatory agency for issues at operating landfills, MDNR would have addressed any such events occurring in the North Quarry Landfill. [NOTE: there is mention in the April 1995 OU-2 RI/FS workplan, Section 2.5.4, of a 1993 “underground fire” in part of the North Quarry landfill cell. In response, “The area which separated from the quarry wall has been sealed with cement slurry.”]

3) Will the EPA give the public...

A: No. The legal citation provided in the question applies to remedial actions only. The gamma cone penetrometer test (GCPT) is not a remedial action.

4) Republic Services plans, if needed, ...

A: The vegetation clearing methods included in the approved GCPT workplan were selected with input from both EPA and MDNR as the methods least likely to generate dust from surface soils. A “brush-hog” will be used only when other vegetation clearing methods are unsuitable, and only after the area to be cleared has been wetted to minimize dust generation. No “notification system” for this vegetation clearing method is planned. Due to the minimal potential for dust generation, the ongoing air testing that is being conducted by MDNR around the perimeter of the facility has been determined to be adequately protective for the GCPT work. No additional air sampling is planned for the GCPT work.